

Executive Summary – Enforcement Matter – Case No. 51928
Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's
Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of
Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi
Congregation of Jehovah's Witnesses
RN106540115
Docket No. 2016-0253-PWS-E

Order Type:

Findings Agreed Order

Findings Order Justification:

Three or more enforcement actions (NOVs, orders, etc.) over the prior five year period for the same violation(s).

Media:

PWS

Small Business:

Yes

Location(s) Where Violation(s) Occurred:

Valley Hi Congregation of Jehovah's Witnesses, 3855 Groesenbacher Road near San Antonio, Bexar County

Type of Operation:

Public water supply

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: June 3, 2016

Comments Received: No

Penalty Information

Total Penalty Assessed: \$762

Amount Deferred for Expedited Settlement: \$0

Amount Deferred for Financial Inability to Pay: \$0

Total Paid to General Revenue: \$762

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project ("SEP") Conditional Offset: \$0

Name of SEP: N/A

Compliance History Classifications:

Person/CN - N/A

Site/RN - N/A

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

Executive Summary – Enforcement Matter – Case No. 51928
Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's
Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of
Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi
Congregation of Jehovah's Witnesses
RN106540115
Docket No. 2016-0253-PWS-E

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: February 1, 2016 through February 12, 2016

Date(s) of NOE(s): February 12, 2016

Violation Information

1. Failed to collect lead and copper samples at the required ten sample sites, have the samples analyzed, and report the results to the Executive Director (“ED”) and failed to issue public notification and submit a copy of the public notification to the ED regarding the failure to collect lead and copper tap samples [30 TEX. ADMIN. CODE §§ 290.117(c)(2)(A) and (h) and (i)(1) and 290.122(c)(2)(A) and (f)].
2. Failed to issue public notification and submit a copy of the public notification to the ED regarding the failure to submit the Disinfectant Level Quarterly Operating Reports [30 TEX. ADMIN. CODE § 290.122(c)(2)(A) and (f)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

The Order will require the Respondents to:

- a. Within 30 days:
 - i. Implement improvements to the Facility’s process procedures, guidance, training, and/or oversight to ensure that all lead and copper tap samples are collected, analyzed, and reported to the ED within ten days following the end of each monitoring period;
 - ii. Implement procedures to ensure that all necessary public notifications are issued in a timely manner to persons served by the Facility and a copy of the public notification is submitted to the ED; and
 - iii. Provide public notification regarding the failure to collect lead and copper tap samples for the January 1, 2014 through June 30, 2014, July 1, 2014 through December 31, 2014, and January 1, 2015 through June 30, 2015 monitoring periods and the failure to submit a Disinfectant Level Quarterly Operating Report for the fourth

Executive Summary – Enforcement Matter – Case No. 51928
Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's
Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of
Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi
Congregation of Jehovah's Witnesses
RN106540115
Docket No. 2016-0253-PWS-E

quarter of 2013, the first quarter of 2014 and the second quarter of 2015 and provide a copy of the public notification to the ED.

- b. Within 45 days, submit written certification to demonstrate compliance with a.
- c. Within 90 days, begin complying with applicable lead and copper monitoring requirements by collecting the required number of lead and copper tap samples, having the results analyzed, and reporting the results to the ED within ten days following the end of the monitoring period. This provision will be satisfied upon two compliant semi-annual monitoring periods.
- d. Within 470 days, submit written certification to demonstrate compliance with c.

Litigation Information

Date Petition(s) Filed: N/A
Date Answer(s) Filed: N/A
SOAH Referral Date: N/A
Hearing Date(s): N/A
Settlement Date: N/A

Contact Information

TCEQ Attorney: N/A
TCEQ Enforcement Coordinator: Ryan Byer, Enforcement Division, Enforcement Team 2, MC 169, (512) 239-2571; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548
TCEQ SEP Coordinator: N/A
Respondent: Mario A. Cortes, Trustee, Valley Hi Congregation of Jehovah's Witnesses, 11666 White Cross, San Antonio, Texas 78253
Francisco C. Sanchez, Trustee, Valley Hi Congregation of Jehovah's Witnesses, 12230 Eucalyptus Street, San Antonio, Texas 78245
Juan Carlos Garza, Elder, Valley Hi Congregation of Jehovah's Witnesses, 839 Robinair Drive, San Antonio, Texas 78245
Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

TCEQ

DATES Assigned 16-Feb-2016
PCW 17-Feb-2016 Screening 17-Feb-2016 EPA Due 30-Jun-2016

RESPONDENT/FACILITY INFORMATION

Respondent Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses
Reg. Ent. Ref. No. RN106540115
Facility/Site Region 13-San Antonio **Major/Minor Source** Minor

CASE INFORMATION

Enf./Case ID No. 51928 **No. of Violations** 2
Docket No. 2016-0253-PWS-E **Order Type** Findings
Media Program(s) Public Water Supply **Government/Non-Profit** Yes
Multi-Media **Enf. Coordinator** Ryan Byer
EC's Team Enforcement Team 2

Admin. Penalty \$ Limit Minimum \$50 **Maximum** \$1,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)

Subtotal 1 \$600

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History 27.0% **Adjustment** **Subtotals 2, 3, & 7** \$162

Notes

Enhancement for five NOV's with the same/similar violations and one NOV with dissimilar violations.

Culpability

No

0.0%

Enhancement

Subtotal 4 \$0

Notes

The Respondents do not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments

Subtotal 5 \$0

Economic Benefit

0.0% Enhancement*

Subtotal 6 \$0

Total EB Amounts \$1,018

Estimated Cost of Compliance \$1,130

*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7

Final Subtotal \$762

OTHER FACTORS AS JUSTICE MAY REQUIRE

0.0%

Adjustment \$0

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

Final Penalty Amount \$762

STATUTORY LIMIT ADJUSTMENT

Final Assessed Penalty \$762

DEFERRAL

0.0%

Reduction

Adjustment \$0

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes

No deferral is recommended for Findings Orders.

PAYABLE PENALTY

\$762

Screening Date 17-Feb-2016

Docket No. 2016-0253-PWS-E

PCW

Respondent Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

Case ID No. 51928

Reg. Ent. Reference No. RN106540115

Media [Statute] Public Water Supply

Enf. Coordinator Ryan Byer

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	5	25%
	Other written NOVs	1	2%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
Please Enter Yes or No			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 27%

>> Repeat Violator (Subtotal 3)

N/A

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

N/A

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for five NOVs with the same/similar violations and one NOV with dissimilar violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 27%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 27%

Screening Date 17-Feb-2016

Docket No. 2016-0253-PWS-E

PCW

Respondent

Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

Case ID No. 51928

Reg. Ent. Reference No. RN106540115

Media [Statute] Public Water Supply

Enf. Coordinator Ryan Byer

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code §§ 290.117(c)(2)(A) and (h) and (i)(1) and 290.122(c)(2)(A) and (f)

Violation Description

Failed to collect lead and copper tap samples at the required ten sample sites, have the samples analyzed, and report the results to the Executive Director for the January 1, 2014 through June 30, 2014, July 1, 2014 through December 31, 2014, and January 1, 2015 through June 30, 2015 monitoring periods and failed to issue public notification and submit a copy of the public notification to the Executive Director regarding the failure to collect lead and copper tap samples for the January 1, 2014 through June 30, 2014, July 1, 2014 through December 31, 2014, and January 1, 2015 through June 30, 2015 monitoring periods.

Base Penalty \$1,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential	x		

Percent 15.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Failure to collect lead and copper tap samples and issue public notification could expose persons served by the Facility to undetected contaminants which would exceed levels protective of human health.

Adjustment \$850

\$150

Violation Events

Number of Violation Events 3

577 Number of violation days

mark only one with an x	daily	
	weekly	
	monthly	
	quarterly	
	semiannual	x
	annual	
	single event	

Violation Base Penalty \$450

Three semiannual events are recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes

The Respondents do not meet the good faith criteria for this violation.

Violation Subtotal \$450

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$1,017

Violation Final Penalty Total \$572

This violation Final Assessed Penalty (adjusted for limits) \$572

Economic Benefit Worksheet

Respondent

Juan Carlos Garza as Trustee of Valley HI Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley HI Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley HI Congregation of Jehovah's Witnesses

Case ID No.

51928

Reg. Ent. Reference No.

RN106540115

Media

Public Water Supply

Violation No.

1

Percent Interest 5.0 **Years of Depreciation** 15

Item Cost **Date Required** **Final Date** **Yrs** **Interest Saved** **Onetime Costs** **EB Amount**

Item Description No commas or \$

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$100	1-Feb-2016	28-Sep-2016	0.66	\$3	n/a	\$3
Training/Sampling	\$100	1-Feb-2016	28-Sep-2016	0.66	\$3	n/a	\$3
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$15	11-Oct-2014	28-Sep-2016	1.97	\$1	n/a	\$1

Notes for DELAYED costs

The record keeping delayed costs include the estimated amount to implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that future lead and copper samples are collected by the Facility's personnel, analyzed, and reported to the Executive Director, calculated from the date of the record review to the estimated date of compliance.

The training/sampling delayed costs include the estimated amount to implement procedures to ensure that all necessary public notifications are provided in a timely manner, calculated from the record review date to the estimated date of compliance.

The other delayed costs include the estimated amount to ensure that all delinquent public notifications (\$5 per notification x three notifications) are provided to persons served by the Facility and a copy of the public notification is provided to the Executive Director, calculated from the due date of earliest public notification to the estimated date of compliance.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]	\$900	1-Jan-2014	30-Jun-2015	2.41	\$108	\$900	\$1,008
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

The one-time avoided cost includes the estimated amount to collect and have all lead and copper samples analyzed (\$30 per sample x ten samples x three monitoring periods), calculated for the monitoring periods in which samples were required.

Approx. Cost of Compliance

\$1,115

TOTAL

\$1,017

Screening Date 17-Feb-2016

Docket No. 2016-0253-PWS-E

PCW

Respondent

Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

Case ID No. 51928

Reg. Ent. Reference No. RN106540115

Media [Statute] Public Water Supply

Enf. Coordinator Ryan Byer

Violation Number 2

Rule Cite(s) 30 Tex. Admin. Code § 290.122(c)(2)(A) and (f)

Violation Description

Failed to issue public notification and submit a copy of the public notification to the Executive Director regarding the failure to submit a Disinfectant Level Quarterly Operating Report for the fourth quarter of 2013, the first quarter of 2014, and second quarter of 2015.

Base Penalty \$1,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			

Percent 0.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor
	x		

Percent 5.0%

Matrix Notes

100% of the rule requirement was not met.

Adjustment \$950

\$50

Violation Events

Number of Violation Events 3

270 Number of violation days

mark only one with an x

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$150

Three single events are recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes

The Respondents do not meet the good faith criteria for this violation.

Violation Subtotal \$150

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$2

Violation Final Penalty Total \$191

This violation Final Assessed Penalty (adjusted for limits) \$191

Economic Benefit Worksheet

Respondent

Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses

Case ID No. 51928

Reg. Ent. Reference No. RN106540115

Media Public Water Supply
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Cost **Date Required** **Final Date** **Yrs** **Interest Saved** **Onetime Costs** **EB Amount**
Item Description No commas or \$

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$15	11-Apr-2014	28-Sep-2016	2.47	\$2	n/a	\$2

Notes for DELAYED costs

The other delayed costs include the estimated amount to ensure that the delinquent public notifications (\$5 per notification x three notifications) are provided to persons served by the Facility and a copy of the public notification is provided to the Executive Director, calculated from the due date of the earliest public notification to the estimated date of compliance.

Additional delayed costs to implement public notification procedures are included in the Economic Benefit of Violation No. 1.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$15

TOTAL

\$2



Compliance History Report

PUBLISHED Compliance History Report for CN604156653, RN106540115, Rating Year 2015 which includes Compliance History (CH) components from September 1, 2010, through August 31, 2015.

Customer, Respondent, or Owner/Operator: CN604156653, Garza, Juan Carlos

Classification: NOT APPLICABLE

Rating: N/A

Regulated Entity: RN106540115, VALLEY HI CONGREGATION OF JEHOVAHS WITNESSES

Classification: NOT APPLICABLE

Rating: N/A

Complexity Points: N/A

Repeat Violator: N/A

CH Group: 14 - Other

Location: 3855 GROSENBACHER ROAD NEAR SAN ANTONIO, BEXAR COUNTY, TEXAS

TCEQ Region: REGION 13 - SAN ANTONIO

ID Number(s):

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 0150558

Compliance History Period: September 01, 2010 to August 31, 2015

Rating Year: 2015

Rating Date: 09/01/2015

Date Compliance History Report Prepared: February 16, 2016

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: February 16, 2010 to February 16, 2016

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Ryan Byer

Phone: (512) 239-2571

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? NO
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO
- 3) If **YES** for #2, who is the current owner/operator? N/A
- 4) If **YES** for #2, who was/were the prior owner(s)/operator(s)? N/A
- 5) If **YES**, when did the change(s) in owner or operator occur? N/A

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

N/A

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1	Date:	03/04/2015	(1308603)	CN604156653
	Self Report?	NO		Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
 30 TAC Chapter 290, SubChapter F 290.122(f)
 Description: LCR IN MR PN 1st 6M2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2014 to 06/30/2014.

2 Date: 05/26/2015 (1308603) CN604156653
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
 30 TAC Chapter 290, SubChapter F 290.122(f)
 Description: LCR IN MR PN 2nd 6M2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 07/01/2014 to 12/31/2014.

3 Date: 08/03/2015 (1308603) CN604156653
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)
 30 TAC Chapter 290, SubChapter F 290.117(i)(1)
 Description: LCR IN MR 1st 6M2015 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 01/01/2015 to 06/30/2015 within the required timeline.

4 Date: 09/25/2015 (1269249) CN604156653
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(n)(1)
 30 TAC Chapter 290, SubChapter D 290.46(n)(3)
 Description: Failure to provide as-built plans or record drawings and specifications and well completion data for the public water supply. Specifically, no as-built plans or record drawings and specifications for the production, treatment, storage and pressure maintenance facilities, and well completion data were provided.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(2)
 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(i)(III)
 Description: Failure to provide documentation that identifies the amount of chemical used each week. Specifically, the facility was not able to provide documentation that identified how much chlorine was used by the facility each week.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(1)(A)
 Description: Failure to conduct annual pressure tank inspections. Specifically, the regulated entity indicated that the pressure tank inspections were not being conducted.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter F 290.110(d)(1)
 30 TAC Chapter 290, SubChapter F 290.110(d)(1)(A)
 30 TAC Chapter 290, SubChapter F 290.110(d)(1)(B)
 30 TAC Chapter 290, SubChapter F 290.110(d)(1)(C)
 Description: Failure to utilize an acceptable method for determining the disinfectant residual. Specifically, the free chlorine residual was being determined using an unapproved method. A Taylor Pool and Spa Water Chemistry Kit was being utilized.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.42(l)
 Description: Failure to provide a plant operations manual. Specifically, the system was not able to provide a plant operations manual for review.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.42(i)
 Description: Failure to obtain a wastewater permit or an exception to the requirement. Specifically, backwash water from an iron filter is discharged onto the lawn. The entity has not obtained a permit or an exception for the discharge.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(t)
 Description: Failure to post a legible ownership sign at the water system's production, treatment, and storage facilities. Specifically, a sign was not present at the water plant.

5 Date: 11/20/2015 (1308603) CN604156653
 Self Report? NO Classification: Moderate

Published Compliance History Report for CN604156653, RN106540115, Rating Year 2015 which includes Compliance History (CH) components from February 16, 2010, through February 16, 2016.

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)
Description: LCR IN MR PN 1st 6M2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2015 to 06/30/2015.

6 Date: 01/29/2016 (1308603) CN604156653
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)
Description: DLQOR MR PN 2Q2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a disinfectant monitoring and reporting violation during the second quarter of 2015.

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Component Appendices

Appendix A

All NOVs Issued During Component Period 2/16/2010 and 2/16/2016

- 1* Date: 09/12/2014 (1308603) CN604156653
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: DLQOR MR PN 4Q2013 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a disinfectant monitoring and reporting violation during the fourth quarter of 2013.
Classification: Moderate
For Informational Purposes Only
- 2* Date: 10/13/2014 (1308603) CN604156653
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: DLQOR MR PN 1Q2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a disinfectant monitoring and reporting violation during the first quarter of 2014.
Classification: Moderate
For Informational Purposes Only
- 3* Date: 11/07/2014 (1308603) CN604156653
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)
Description: LCR IN MR 1st 6M2014 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 01/01/2014 to 06/30/2014 within the required timeline.
Classification: Moderate
For Informational Purposes Only
- 4* Date: 01/28/2015 (1308603) CN604156653
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)
Description: LCR IN MR 2nd 6M2014 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 07/01/2014 to 12/31/2014 within the required timeline.
Classification: Moderate
For Informational Purposes Only
- 5* Date: 03/04/2015 (1308603) CN604156653
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: LCR IN MR PN 1st 6M2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2014 to 06/30/2014.
Classification: Moderate
For Informational Purposes Only
- 6* Date: 05/26/2015 (1308603) CN604156653
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: LCR IN MR PN 2nd 6M2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 07/01/2014 to 12/31/2014.
Classification: Moderate
For Informational Purposes Only
- 7* Date: 08/03/2015 (1308603) CN604156653
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)
Description: LCR IN MR 1st 6M2015 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 01/01/2015 to 06/30/2015 within the required timeline.
Classification: Moderate
For Informational Purposes Only

8

Date: 09/25/2015 (1269249) CN604156653

Self Report? NO **For Informational Purposes Only** Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(n)(1)
30 TAC Chapter 290, SubChapter D 290.46(n)(3)

Description: Failure to provide as-built plans or record drawings and specifications and well completion data for the public water supply. Specifically, no as-built plans or record drawings and specifications for the production, treatment, storage and pressure maintenance facilities, and well completion data were provided.

Self Report? NO **For Informational Purposes Only** Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(2)
30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(i)(III)

Description: Failure to provide documentation that identifies the amount of chemical used each week. Specifically, the facility was not able to provide documentation that identified how much chlorine was used by the facility each week.

Self Report? NO **For Informational Purposes Only** Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(1)(A)

Description: Failure to conduct annual pressure tank inspections. Specifically, the regulated entity indicated that the pressure tank inspections were not being conducted.

Self Report? NO **For Informational Purposes Only** Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter F 290.110(d)(1)
30 TAC Chapter 290, SubChapter F 290.110(d)(1)(A)
30 TAC Chapter 290, SubChapter F 290.110(d)(1)(B)
30 TAC Chapter 290, SubChapter F 290.110(d)(1)(C)

Description: Failure to utilize an acceptable method for determining the disinfectant residual. Specifically, the free chlorine residual was being determined using an unapproved method. A Taylor Pool and Spa Water Chemistry Kit was being utilized.

Self Report? NO **For Informational Purposes Only** Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.42(l)

Description: Failure to provide a plant operations manual. Specifically, the system was not able to provide a plant operations manual for review.

Self Report? NO **For Informational Purposes Only** Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.42(i)

Description: Failure to obtain a wastewater permit or an exception to the requirement. Specifically, backwash water from an iron filter is discharged onto the lawn. The entity has not obtained a permit or an exception for the discharge.

Self Report? NO **For Informational Purposes Only** Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(t)

Description: Failure to post a legible ownership sign at the water system's production, treatment, and storage facilities. Specifically, a sign was not present at the water plant.

9

Date: 11/20/2015 (1308603) CN604156653

Self Report? NO **For Informational Purposes Only** Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)

Description: LCR IN MR PN 1st 6M2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2015 to 06/30/2015.

10

Date: 01/29/2016 (1308603) CN604156653

Self Report? NO **For Informational Purposes Only** Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)

Description: DLQOR MR PN 2Q2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a disinfectant monitoring and reporting violation during the second quarter of 2015.

* NOVs applicable for the Compliance History rating period 9/1/2010 to 8/31/2015

Appendix B

All Investigations Conducted During Component Period February 16, 2010 and February 16, 2016

Item 1	September 23, 2015	(1769249) For Informational Purposes Only
Item 2	February 08, 2016	(1808603) For Informational Purposes Only
Item 3	February 12, 2016	(1808670) For Informational Purposes Only

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2010 and 08/31/2015.



Compliance History Report

PUBLISHED Compliance History Report for CN604156661, RN106540115, Rating Year 2015 which includes Compliance History (CH) components from September 1, 2010, through August 31, 2015.

Customer, Respondent, or Owner/Operator: CN604156661, Cortes, Mario A.

Classification: NOT APPLICABLE

Rating: N/A

Regulated Entity: RN106540115, VALLEY HI CONGREGATION OF JEHOVAHS WITNESSES

Classification: NOT APPLICABLE

Rating: N/A

Complexity Points: N/A

Repeat Violator: N/A

CH Group: 14 - Other

Location: 3855 GROSENBACHER ROAD NEAR SAN ANTONIO, BEXAR COUNTY, TEXAS

TCEQ Region: REGION 13 - SAN ANTONIO

ID Number(s):

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 0150558

Compliance History Period: September 01, 2010 to August 31, 2015

Rating Year: 2015

Rating Date: 09/01/2015

Date Compliance History Report Prepared: February 16, 2016

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: February 16, 2010 to February 16, 2016

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Ryan Byer

Phone: (512) 239-2571

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? NO
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO
- 3) If **YES** for #2, who is the current owner/operator? N/A
- 4) If **YES** for #2, who was/were the prior owner(s)/operator(s)? N/A
- 5) If **YES**, when did the change(s) in owner or operator occur? N/A

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

N/A

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1 Date: 03/04/2015 (1308603) CN604156661

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
 30 TAC Chapter 290, SubChapter F 290.122(f)
 Description: LCR IN MR PN 1st 6M2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2014 to 06/30/2014.

2 Date: 05/26/2015 (1308603) CN604156661
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
 30 TAC Chapter 290, SubChapter F 290.122(f)
 Description: LCR IN MR PN 2nd 6M2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 07/01/2014 to 12/31/2014.

3 Date: 08/03/2015 (1308603) CN604156661
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)
 30 TAC Chapter 290, SubChapter F 290.117(i)(1)
 Description: LCR IN MR 1st 6M2015 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 01/01/2015 to 06/30/2015 within the required timeline.

4 Date: 09/25/2015 (1269249) CN604156661
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(n)(1)
 30 TAC Chapter 290, SubChapter D 290.46(n)(3)
 Description: Failure to provide as-built plans or record drawings and specifications and well completion data for the public water supply. Specifically, no as-built plans or record drawings and specifications for the production, treatment, storage and pressure maintenance facilities, and well completion data were provided.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(2)
 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(i)(III)
 Description: Failure to provide documentation that identifies the amount of chemical used each week. Specifically, the facility was not able to provide documentation that identified how much chlorine was used by the facility each week.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(1)(A)
 Description: Failure to conduct annual pressure tank inspections. Specifically, the regulated entity indicated that the pressure tank inspections were not being conducted.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter F 290.110(d)(1)
 30 TAC Chapter 290, SubChapter F 290.110(d)(1)(A)
 30 TAC Chapter 290, SubChapter F 290.110(d)(1)(B)
 30 TAC Chapter 290, SubChapter F 290.110(d)(1)(C)
 Description: Failure to utilize an acceptable method for determining the disinfectant residual. Specifically, the free chlorine residual was being determined using an unapproved method. A Taylor Pool and Spa Water Chemistry Kit was being utilized.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.42(l)
 Description: Failure to provide a plant operations manual. Specifically, the system was not able to provide a plant operations manual for review.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.42(i)
 Description: Failure to obtain a wastewater permit or an exception to the requirement. Specifically, backwash water from an iron filter is discharged onto the lawn. The entity has not obtained a permit or an exception for the discharge.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(t)
 Description: Failure to post a legible ownership sign at the water system's production, treatment, and storage facilities. Specifically, a sign was not present at the water plant.

5 Date: 11/20/2015 (1308603) CN604156661
 Self Report? NO Classification: Moderate

Published Compliance History Report for CN604156661, RN106540115, Rating Year 2015 which includes Compliance History (CH) components from February 16, 2010, through February 16, 2016.

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)
Description: LCR IN MR PN 1st 6M2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2015 to 06/30/2015.

6 Date: 01/29/2016 (1308603) CN604156661
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)
Description: DLQOR MR PN 2Q2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a disinfectant monitoring and reporting violation during the second quarter of 2015.

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Component Appendices

Appendix A

All NOVs Issued During Component Period 2/16/2010 and 2/16/2016

- 1* Date: 09/12/2014 (1308603) CN604156661
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: DLQOR MR PN 4Q2013 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a disinfectant monitoring and reporting violation during the fourth quarter of 2013.
Classification: Moderate
For Informational Purposes Only
- 2* Date: 10/13/2014 (1308603) CN604156661
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: DLQOR MR PN 1Q2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a disinfectant monitoring and reporting violation during the first quarter of 2014.
Classification: Moderate
For Informational Purposes Only
- 3* Date: 11/07/2014 (1308603) CN604156661
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)
Description: LCR IN MR 1st 6M2014 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 01/01/2014 to 06/30/2014 within the required timeline.
Classification: Moderate
For Informational Purposes Only
- 4* Date: 01/28/2015 (1308603) CN604156661
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)
Description: LCR IN MR 2nd 6M2014 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 07/01/2014 to 12/31/2014 within the required timeline.
Classification: Moderate
For Informational Purposes Only
- 5* Date: 03/04/2015 (1308603) CN604156661
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: LCR IN MR PN 1st 6M2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2014 to 06/30/2014.
Classification: Moderate
For Informational Purposes Only
- 6* Date: 05/26/2015 (1308603) CN604156661
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: LCR IN MR PN 2nd 6M2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 07/01/2014 to 12/31/2014.
Classification: Moderate
For Informational Purposes Only
- 7* Date: 08/03/2015 (1308603) CN604156661
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)
Description: LCR IN MR 1st 6M2015 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 01/01/2015 to 06/30/2015 within the required timeline.
Classification: Moderate
For Informational Purposes Only

8

Date: 09/25/2015 (1269249) CN604156661

Self Report? NO **For Informational Purposes Only** Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(n)(1)
30 TAC Chapter 290, SubChapter D 290.46(n)(3)

Description: Failure to provide as-built plans or record drawings and specifications and well completion data for the public water supply. Specifically, no as-built plans or record drawings and specifications for the production, treatment, storage and pressure maintenance facilities, and well completion data were provided.

Self Report? NO **For Informational Purposes Only** Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(2)
30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(i)(III)

Description: Failure to provide documentation that identifies the amount of chemical used each week. Specifically, the facility was not able to provide documentation that identified how much chlorine was used by the facility each week.

Self Report? NO **For Informational Purposes Only** Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(1)(A)

Description: Failure to conduct annual pressure tank inspections. Specifically, the regulated entity indicated that the pressure tank inspections were not being conducted.

Self Report? NO **For Informational Purposes Only** Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter F 290.110(d)(1)
30 TAC Chapter 290, SubChapter F 290.110(d)(1)(A)
30 TAC Chapter 290, SubChapter F 290.110(d)(1)(B)
30 TAC Chapter 290, SubChapter F 290.110(d)(1)(C)

Description: Failure to utilize an acceptable method for determining the disinfectant residual. Specifically, the free chlorine residual was being determined using an unapproved method. A Taylor Pool and Spa Water Chemistry Kit was being utilized.

Self Report? NO **For Informational Purposes Only** Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.42(l)

Description: Failure to provide a plant operations manual. Specifically, the system was not able to provide a plant operations manual for review.

Self Report? NO **For Informational Purposes Only** Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.42(i)

Description: Failure to obtain a wastewater permit or an exception to the requirement. Specifically, backwash water from an iron filter is discharged onto the lawn. The entity has not obtained a permit or an exception for the discharge.

Self Report? NO **For Informational Purposes Only** Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(t)

Description: Failure to post a legible ownership sign at the water system's production, treatment, and storage facilities. Specifically, a sign was not present at the water plant.

9

Date: 11/20/2015 (1308603) CN604156661

Self Report? NO **For Informational Purposes Only** Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)

Description: LCR IN MR PN 1st 6M2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2015 to 06/30/2015.

10

Date: 01/29/2016 (1308603) CN604156661

Self Report? NO **For Informational Purposes Only** Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)

Description: DLQOR MR PN 2Q2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a disinfectant monitoring and reporting violation during the second quarter of 2015.

* NOVs applicable for the Compliance History rating period 9/1/2010 to 8/31/2015

Appendix B

All Investigations Conducted During Component Period February 16, 2010 and February 16, 2016

Item 1	September 23, 2015	(1269249) For Informational Purposes Only
Item 2	February 08, 2016	(1308603) For Informational Purposes Only
Item 3	February 12, 2016	(1308670) For Informational Purposes Only

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2010 and 08/31/2015.



Compliance History Report

PUBLISHED Compliance History Report for CN604156679, RN106540115, Rating Year 2015 which includes Compliance History (CH) components from September 1, 2010, through August 31, 2015.

Customer, Respondent, or Owner/Operator: CN604156679, Sanchez, Francisco C.

Classification: NOT APPLICABLE

Rating: N/A

Regulated Entity: RN106540115, VALLEY HI CONGREGATION OF JEHOVAHS WITNESSES

Classification: NOT APPLICABLE

Rating: N/A

Complexity Points: N/A

Repeat Violator: N/A

CH Group: 14 - Other

Location: 3855 GROSENBACHER ROAD NEAR SAN ANTONIO, BEXAR COUNTY, TEXAS

TCEQ Region: REGION 13 - SAN ANTONIO

ID Number(s):

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 0150558

Compliance History Period: September 01, 2010 to August 31, 2015

Rating Year: 2015

Rating Date: 09/01/2015

Date Compliance History Report Prepared: February 16, 2016

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: February 16, 2010 to February 16, 2016

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Ryan Byer

Phone: (512) 239-2571

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? NO
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO
- 3) If **YES** for #2, who is the current owner/operator? N/A
- 4) If **YES** for #2, who was/were the prior owner(s)/operator(s)? N/A
- 5) If **YES**, when did the change(s) in owner or operator occur? N/A

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

N/A

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1	Date:	03/04/2015	(1308603)	CN604156679
	Self Report?	NO		Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
 30 TAC Chapter 290, SubChapter F 290.122(f)
 Description: LCR IN MR PN 1st 6M2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2014 to 06/30/2014.

2 Date: 05/26/2015 (1308603) CN604156679
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
 30 TAC Chapter 290, SubChapter F 290.122(f)
 Description: LCR IN MR PN 2nd 6M2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 07/01/2014 to 12/31/2014.

3 Date: 08/03/2015 (1308603) CN604156679
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)
 30 TAC Chapter 290, SubChapter F 290.117(i)(1)
 Description: LCR IN MR 1st 6M2015 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 01/01/2015 to 06/30/2015 within the required timeline.

4 Date: 09/25/2015 (1269249) CN604156679
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(n)(1)
 30 TAC Chapter 290, SubChapter D 290.46(n)(3)
 Description: Failure to provide as-built plans or record drawings and specifications and well completion data for the public water supply. Specifically, no as-built plans or record drawings and specifications for the production, treatment, storage and pressure maintenance facilities, and well completion data were provided.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(2)
 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(i)(III)
 Description: Failure to provide documentation that identifies the amount of chemical used each week. Specifically, the facility was not able to provide documentation that identified how much chlorine was used by the facility each week.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(1)(A)
 Description: Failure to conduct annual pressure tank inspections. Specifically, the regulated entity indicated that the pressure tank inspections were not being conducted.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter F 290.110(d)(1)
 30 TAC Chapter 290, SubChapter F 290.110(d)(1)(A)
 30 TAC Chapter 290, SubChapter F 290.110(d)(1)(B)
 30 TAC Chapter 290, SubChapter F 290.110(d)(1)(C)
 Description: Failure to utilize an acceptable method for determining the disinfectant residual. Specifically, the free chlorine residual was being determined using an unapproved method. A Taylor Pool and Spa Water Chemistry Kit was being utilized.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.42(l)
 Description: Failure to provide a plant operations manual. Specifically, the system was not able to provide a plant operations manual for review.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 290, SubChapter D 290.42(i)
 Description: Failure to obtain a wastewater permit or an exception to the requirement. Specifically, backwash water from an iron filter is discharged onto the lawn. The entity has not obtained a permit or an exception for the discharge.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(t)
 Description: Failure to post a legible ownership sign at the water system's production, treatment, and storage facilities. Specifically, a sign was not present at the water plant.

5 Date: 11/20/2015 (1308603) CN604156679
 Self Report? NO Classification: Moderate

Published Compliance History Report for CN604156679, RN106540115, Rating Year 2015 which includes Compliance History (CH) components from February 16, 2010, through February 16, 2016.

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)
Description: LCR IN MR PN 1st 6M2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2015 to 06/30/2015.

6 Date: 01/29/2016 (1308603) CN604156679
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)
Description: DLQOR MR PN 2Q2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a disinfectant monitoring and reporting violation during the second quarter of 2015.

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Component Appendices

Appendix A

All NOVs Issued During Component Period 2/16/2010 and 2/16/2016

- 1* Date: 09/12/2014 (1308603) CN604156679
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: DLQOR MR PN 4Q2013 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a disinfectant monitoring and reporting violation during the fourth quarter of 2013.
- 2* Date: 10/13/2014 (1308603) CN604156679
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: DLQOR MR PN 1Q2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a disinfectant monitoring and reporting violation during the first quarter of 2014.
- 3* Date: 11/07/2014 (1308603) CN604156679
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)
Description: LCR IN MR 1st 6M2014 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 01/01/2014 to 06/30/2014 within the required timeline.
- 4* Date: 01/28/2015 (1308603) CN604156679
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)
Description: LCR IN MR 2nd 6M2014 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 07/01/2014 to 12/31/2014 within the required timeline.
- 5* Date: 03/04/2015 (1308603) CN604156679
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: LCR IN MR PN 1st 6M2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2014 to 06/30/2014.
- 6* Date: 05/26/2015 (1308603) CN604156679
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
Description: LCR IN MR PN 2nd 6M2014 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 07/01/2014 to 12/31/2014.
- 7* Date: 08/03/2015 (1308603) CN604156679
Self Report? NO
Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(A)(i)
Description: LCR IN MR 1st 6M2015 - The system failed to monitor and/or report distribution lead and copper levels to the TCEQ for the initial six-month monitoring period from 01/01/2015 to 06/30/2015 within the required timeline.

8

Date: 09/25/2015 (1269249)

CN604156679

Self Report? NO

For Informational Purposes Only Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(n)(1)
30 TAC Chapter 290, SubChapter D 290.46(n)(3)

Description: Failure to provide as-built plans or record drawings and specifications and well completion data for the public water supply. Specifically, no as-built plans or record drawings and specifications for the production, treatment, storage and pressure maintenance facilities, and well completion data were provided.

Self Report? NO

For Informational Purposes Only Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(2)
30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(i)(III)

Description: Failure to provide documentation that identifies the amount of chemical used each week. Specifically, the facility was not able to provide documentation that identified how much chlorine was used by the facility each week.

Self Report? NO

For Informational Purposes Only Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)(1)(A)

Description: Failure to conduct annual pressure tank inspections. Specifically, the regulated entity indicated that the pressure tank inspections were not being conducted.

Self Report? NO

For Informational Purposes Only Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter F 290.110(d)(1)
30 TAC Chapter 290, SubChapter F 290.110(d)(1)(A)
30 TAC Chapter 290, SubChapter F 290.110(d)(1)(B)
30 TAC Chapter 290, SubChapter F 290.110(d)(1)(C)

Description: Failure to utilize an acceptable method for determining the disinfectant residual. Specifically, the free chlorine residual was being determined using an unapproved method. A Taylor Pool and Spa Water Chemistry Kit was being utilized.

Self Report? NO

For Informational Purposes Only Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.42(l)

Description: Failure to provide a plant operations manual. Specifically, the system was not able to provide a plant operations manual for review.

Self Report? NO

For Informational Purposes Only Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter D 290.42(i)

Description: Failure to obtain a wastewater permit or an exception to the requirement. Specifically, backwash water from an iron filter is discharged onto the lawn. The entity has not obtained a permit or an exception for the discharge.

Self Report? NO

For Informational Purposes Only Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.46(t)

Description: Failure to post a legible ownership sign at the water system's production, treatment, and storage facilities. Specifically, a sign was not present at the water plant.

9

Date: 11/20/2015 (1308603)

CN604156679

Self Report? NO

For Informational Purposes Only Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)

Description: LCR IN MR PN 1st 6M2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution initial lead and copper monitoring and reporting violation for the six-month monitoring period from 01/01/2015 to 06/30/2015.

10

Date: 01/29/2016 (1308603)

CN604156679

Self Report? NO

For Informational Purposes Only Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
30 TAC Chapter 290, SubChapter F 290.122(f)

Description: DLQOR MR PN 2Q2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a disinfectant monitoring and reporting violation during the second quarter of 2015.

* NOVs applicable for the Compliance History rating period 9/1/2010 to 8/31/2015

Appendix B

All Investigations Conducted During Component Period February 16, 2010 and February 16, 2016

Item 1	September 23, 2015	(1769249) For Informational Purposes Only
Item 2	February 08, 2016	(1708603) For Informational Purposes Only
Item 3	February 12, 2016	(1708670) For Informational Purposes Only

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2010 and 08/31/2015.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION		
CONCERNING		
JUAN CARLOS GARZA AS TRUSTEE	§	
OF VALLEY HI CONGREGATION OF		
JEHOVAH'S WITNESSES, MARIO A.		
CORTES AS TRUSTEE OF VALLEY	§	TEXAS COMMISSION ON
HI CONGREGATION OF JEHOVAH'S		
WITNESSES AND FRANCISCO C.		
SANCHEZ AS TRUSTEE OF VALLEY	§	
HI CONGREGATION OF JEHOVAH'S		
WITNESSES		
RN106540115	§	ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2016-0253-PWS-E

At its _____ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses (the "Respondents") under the authority of TEX. HEALTH & SAFETY CODE ch. 341. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondents presented this agreement to the Commission.

The Respondents understand that they have certain procedural rights at certain points in the enforcement process, including, but not limited to, the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Agreed Order, the Respondents agree to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated settlement of the parties. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Agreed Order are binding upon the Respondents.

The Commission makes the following Findings of Fact and Conclusions of Law:

I. FINDINGS OF FACT

1. The Respondents own and operate a public water supply located at 3855 Grosenbacher Road near San Antonio, Bexar County, Texas (the "Facility") that has one service connection and serves at least 25 people per day for at least 60 days per year.
2. During a record review conducted from February 1, 2016 through February 12, 2016, TCEQ staff documented that the Respondents did not collect lead and copper tap samples at the required ten sample sites, have the samples analyzed, and report the results to the Executive Director for the January 1, 2014 through June 30, 2014, July 1, 2014 through December 31, 2014, and January 1, 2015 through June 30, 2015 monitoring periods and did not issue public notification and submit a copy of the public notification to the Executive Director regarding the failure to collect lead and copper tap samples for the January 1, 2014 through June 30, 2014, July 1, 2014 through December 31, 2014, and January 1, 2015 through June 30, 2015 monitoring periods.
3. During a record review conducted from February 1, 2016 through February 12, 2016, TCEQ staff documented that the Respondents did not issue public notification and submit a copy of the public notification to the Executive Director regarding the failure to submit a Disinfectant Level Quarterly Operating Report ("DLQOR") for the fourth quarter of 2013, the first quarter of 2014, and the second quarter of 2015.
4. The Respondents received notice of the violations on or about February 17, 2016.

II. CONCLUSIONS OF LAW

1. The Respondents are subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 341 and the rules of the Commission.
2. As evidenced by Findings of Fact No. 2, the Respondents failed to collect lead and copper samples at the required ten sample sites, have the samples analyzed, and report the results to the Executive Director and failed to issue public notification and submit a copy of the public notification to the Executive Director regarding the failure to collect lead

and copper tap samples, in violation of 30 TEX. ADMIN. CODE §§ 290.117(c)(2)(A) and (h) and (i)(1) and 290.122(c)(2)(A) and (f).

3. As evidenced by Findings of Fact No. 3, the Respondents failed to issue public notification and submit a copy of the public notification to the Executive Director regarding the failure to submit the DLQORs, in violation of 30 TEX. ADMIN. CODE § 290.122(c)(2)(A) and (f).
4. Pursuant to TEX. HEALTH & SAFETY CODE § 341.049, the Commission has the authority to assess an administrative penalty against the Respondents for violations of the Texas Water Code and the Texas Health and Safety Code within the Commission's jurisdiction; for violations of rules adopted under such statutes; or for violations of orders or permits issued under such statutes.
5. An administrative penalty in the amount of Seven Hundred Sixty-Two Dollars (\$762) is justified by the facts recited in this Agreed Order, and considered in light of the factors set forth in TEX. HEALTH & SAFETY CODE § 341.049(b). The Respondents have paid the Seven Hundred Sixty-Two Dollar (\$762) administrative penalty.

III. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondents are assessed an administrative penalty in the amount of Seven Hundred Sixty-Two Dollars (\$762) as set forth in Section II, Paragraph 5 above, for violations of TCEQ rules and state statutes. The payment of this administrative penalty and the Respondents compliance with all the terms and conditions set forth in this Agreed Order completely resolve the violations set forth by this Agreed Order in this action. However, the Commission shall not be constrained in any manner from requiring corrective actions or penalties for other violations that are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Docket No. 2016-0253-PWS-E" to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. The Respondents are jointly and severally liable for the violations documented in this Agreed Order, and are jointly and severally liable for timely and satisfactory compliance with all terms and conditions of this Agreed Order.
3. The Respondents shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Agreed Order:
 - i. Implement improvements to the Facility's process procedures, guidance, training, and/or oversight to ensure that all lead and copper tap samples are collected, analyzed, and reported to the Executive Director within ten days following the end of each monitoring period, in accordance with 30 TEX. ADMIN. CODE § 290.117;
 - ii. Implement procedures to ensure that all necessary public notifications are issued in a timely manner to persons served by the Facility and a copy of the public notification is submitted to the Executive Director, in accordance with 30 TEX. ADMIN. CODE § 290.122; and
 - iii. Provide public notification regarding the failure to collect lead and copper tap samples for the January 1, 2014 through June 30, 2014, July 1, 2014 through December 31, 2014, and January 1, 2015 through June 30, 2015 monitoring periods and the failure to submit a DLQOR for the fourth quarter of 2013, the first quarter of 2014 and the second quarter of 2015 and provide a copy of the public notification to the Executive Director, in accordance with 30 TEX. ADMIN. CODE § 290.122.
 - b. Within 45 days after the effective date of this Agreed Order, submit written certification as described in Ordering Provision No. 3.d. below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 3.a.i. through 3.a.iii.
 - c. Within 90 days after the effective date of this Agreed Order, begin complying with applicable lead and copper monitoring requirements by collecting the required number of lead and copper tap samples, having the results analyzed, and reporting the results to the Executive Director within ten days following the end of the monitoring period, in accordance with 30 TEX. ADMIN. CODE § 290.117. This provision will be satisfied upon two compliant semi-annual monitoring periods.
 - d. Within 470 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance

with Ordering Provision No. 3.c. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Public Drinking Water Section Manager
Water Supply Division, MC 155
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. The provisions of this Agreed Order shall apply to and be binding upon the Respondents. The Respondents are ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondents shall be made in writing to the Executive Director. Extensions are not effective until the Respondents receive written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
6. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to the Respondents if the Executive Director determines that the Respondents have not complied with one or more of the terms or conditions in this Agreed Order.

7. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
8. This Agreed Order, issued by the Commission, shall not be admissible against the Respondents in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
9. This Agreed Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses
DOCKET NO. 2016-0253-PWS-E

Page 7

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

Date

8/19/16

Date

I, the undersigned, have read and understand the attached Agreed Order in the matter of Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses. I am authorized to agree to the attached Agreed Order on behalf of Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses, and do agree to the specified terms and conditions. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I understand that by entering into this Agreed Order, Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses waives certain procedural rights, including, but not limited to, the right to formal notice of violations addressed by this Agreed Order, notice of an evidentiary hearing, the right to an evidentiary hearing, and the right to appeal. I agree to the terms of the Agreed Order in lieu of an evidentiary hearing. This Agreed Order constitutes full and final adjudication by the Commission of the violations set forth in this Agreed Order.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Signature

JUAN CARLOS GARZA

Name (Printed or typed)

Authorized Representative of
Juan Carlos Garza

Date

5/1/16

Title

ELDER

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Section III, Paragraph 1 of this Agreed Order.

Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses

DOCKET NO. 2016-0253-PWS-E

Page 8

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date


For the Executive Director

8/19/16
Date

I, the undersigned, have read and understand the attached Agreed Order in the matter of Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses. I am authorized to agree to the attached Agreed Order on behalf of Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses, and do agree to the specified terms and conditions. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I understand that by entering into this Agreed Order, Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses waives certain procedural rights, including, but not limited to, the right to formal notice of violations addressed by this Agreed Order, notice of an evidentiary hearing, the right to an evidentiary hearing, and the right to appeal. I agree to the terms of the Agreed Order in lieu of an evidentiary hearing. This Agreed Order constitutes full and final adjudication by the Commission of the violations set forth in this Agreed Order.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.


Signature

5-5-2016
Date

Mario A. Cortes
Name (Printed or typed)
Authorized Representative of
Mario A. Cortes

Trustee
Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Section III, Paragraph 1 of this Agreed Order.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Pommo McVine Jr
For the Executive Director

Date

8/19/16
Date

I, the undersigned, have read and understand the attached Agreed Order in the matter of Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses. I am authorized to agree to the attached Agreed Order on behalf of Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses, and do agree to the specified terms and conditions. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I understand that by entering into this Agreed Order, Juan Carlos Garza as Trustee of Valley Hi Congregation of Jehovah's Witnesses, Mario A. Cortes as Trustee of Valley Hi Congregation of Jehovah's Witnesses and Francisco C. Sanchez as Trustee of Valley Hi Congregation of Jehovah's Witnesses waives certain procedural rights, including, but not limited to, the right to formal notice of violations addressed by this Agreed Order, notice of an evidentiary hearing, the right to an evidentiary hearing, and the right to appeal. I agree to the terms of the Agreed Order in lieu of an evidentiary hearing. This Agreed Order constitutes full and final adjudication by the Commission of the violations set forth in this Agreed Order.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Francisco C. Sanchez
Signature

APRIL 29, 2016
Date

FRANCISCO C. SANCHEZ
Name (Printed or typed)
Authorized Representative of
Francisco C. Sanchez

TRUSTEE
Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Section III, Paragraph 1 of this Agreed Order.